

Exhibit 37



July 19, 2024

Saniya Suri
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By Email

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**Re: Deficiencies in SaveOnSP's Document Productions and Custodians
 Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,
 Case No. 2:22-cv-02632 (JKS) (CLW)**

Dear Meredith:

We write in response to your July 3, 2024 letter and further to JJHCS's May 24 and June 25, 2024 letters regarding SaveOnSP's document production and custodians.

As you know, in our May 24, 2024 letter, we requested that SaveOnSP "provide a complete list of SaveOnSP's document custodians" following SaveOnSP's belated notice that it had added Jessica Johnson and Kelsey Leger as custodians. May 24, 2024 Ltr. from S. Suri to M. Nelson at 2. After nearly a month, in your June 20, 2024 letter, you provided a list of all SaveOnSP document custodians, which included, *inter alia*, Brandon Bartz, Hailey Kramer, Sandy Mozrall, Jenna Quinn, Lauren Pacillo, Shannon Sommer, and Ingrid Vasquez. See June 20, 2024 Ltr. from M. Nelson to S. Suri App'x A. On June 25, 2024, we then asked that you share "the applicable search parameters for [those custodians]." June 25, 2024 Ltr. from S. Suri to M. Nelson at 1. Only then did SaveOnSP reverse course and claim in its July 3, 2024 letter that these seven individuals "were incorrectly included on the list of custodians SaveOn provided." July 3, 2024 Ltr. from M. Nelson to S. Suri at 1.

This change in position is troubling. JJHCS's investigation of SaveOnSP's production shows that there have been over 1,700 documents produced from these seven individuals' custodial files collectively, yet SaveOnSP has not identified what specifically has been produced from their files or what search terms may have been applied in doing so. Please do so promptly.

In any event, SaveOnSP should—at a minimum—add the following individuals as custodians:

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Jenna Quinn and Ingrid Vasquez. JJHCS first requested SaveOnSP add Ms. Quinn and Ms. Vasquez as custodians in February 2024. *See* Feb. 16, 2024 Ltr. from K. Brisson to E. Snow. The parties exchanged various correspondence and met and conferred on this issue for over two months.¹ In its last letter on April 19, 2024, JJHCS asked SaveOnSP to “reconsider its relevance objection to JJHCS’s request that SaveOnSP designate . . . Quinn, and Vazquez as custodians”; “propose search terms you would be willing to run for . . . Quinn, and Vazquez and provide hit counts for each custodian, individually and in the aggregate, for each proposed term”; and provide availability to meet and confer. Apr. 19, 2024 Ltr. from K. Brisson to A. Miner. But SaveOnSP never responded, despite JJHCS’s request that SaveOnSP “provide a response by April 26.” *Id.*

JJHCS now renews its request to add Ms. Quinn and Ms. Vazquez as custodians, particularly insofar as SaveOnSP has apparently already collected at least some of their documents. As JJHCS has previously made clear, Ms. Quinn and Ms. Vazquez are likely to possess highly relevant documents concerning SaveOnSP’s ongoing scheme to evade manufacturer detection. *See generally* Feb. 16, 2024 Ltr. from K. Brisson to E. Snow (detailing at length how the proposed custodians have engaged in deceptive tactics, including mock enrollments into manufacturers’ copay assistance programs, intended to prevent manufacturers from identifying SaveOnSP employees and patients).

Brandon Bartz. Documents and communications demonstrate that Mr. Bartz played a role in SaveOnSP’s efforts to evade detection by drug manufacturers and perpetuating its deceptive practices. In his role as Member Services Training Specialist, Mr. Bartz [REDACTED]
[REDACTED]
[REDACTED] *See* SOSP_0849497 & SOSP_0849498 ([REDACTED]
[REDACTED]”);
SOSP_1144208 ([REDACTED]); SOSP_1144211
([REDACTED]). Specifically,
Mr. Bartz trained PSRs [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], *see*
SOSP_1144212 ([REDACTED]); emphasized that
[REDACTED],” SOSP_1078528 (emphasis in original);
[REDACTED],”
id. He also [REDACTED]
SOSP_1031645; *see also* SOSP_1031646 (“[REDACTED]
[REDACTED]

¹ *See* Mar. 1, 2024 Ltr. from M. Nussbaum to K. Brisson; Mar. 4, 2024 Email from K. Brisson to M. Nussbaum; Mar. 6, 2024 Email from M. Nussbaum to K. Brisson; Mar. 8, 2024 Email from M. Nussbaum to K. Brisson; Mar. 15, 2024 Ltr. from K. Brisson to M. Nussbaum; Apr. 1, 2024 Ltr. from M. Nussbaum to K. Brisson; Apr. 1, 2024 Ltr. from K. Brisson to M. Nussbaum; Apr. 18, 2024 Ltr. from A. Miner to K. Brisson; Apr. 19, 2024 Ltr. from K. Brisson to A. Miner.

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[REDACTED].”). Additionally, he discussed [REDACTED]
[REDACTED]. See SOSP_2085041 ([REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]).

Shannon Sommer. SaveOnSP’s production demonstrates that Sommer has relevant documents and communications. For example, Sommer [REDACTED]
[REDACTED] See SOSP_0566671 ([REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]); see also SOSP_0945862 ([REDACTED]
[REDACTED]). Sommer also was involved in discussions about [REDACTED]
[REDACTED] see SOSP_1097426, and communications [REDACTED]
[REDACTED], see SOSP_1220985 ([REDACTED]
[REDACTED]
[REDACTED]); SOSP_1143088 [REDACTED]
[REDACTED]).

Hailey Kramer. SaveOnSP’s production demonstrates that Ms. Kramer also has relevant documents and communications, especially related to manufacturer evasion. In her role as a quality assurance auditor, Ms. Kramer [REDACTED]
[REDACTED]
[REDACTED] See SOSP_1116400 [REDACTED]
[REDACTED]
[REDACTED]”); see also SOSP_1144213 ([REDACTED]
[REDACTED]
[REDACTED]); SOSP_1144214 ([REDACTED]
[REDACTED]). For example, Ms. Kramer advised employees on [REDACTED]
[REDACTED]” SOSP_1116400 [REDACTED]
[REDACTED].”). She specifically
[REDACTED]
[REDACTED]
[REDACTED].” *Id.*; see also SOSP_1144264 [REDACTED]
[REDACTED]
[REDACTED]”). These issues of manufacturer evasion and deception are squarely relevant. See Apr. 10, 2024 Order at 8 n.4.

Please confirm that you will collect and review all relevant custodial files, including messages, hard drives, mobile devices, and personal email accounts, if applicable, for all five individuals identified above. As to Ms. Quinn and Ms. Vazquez, please confirm SaveOnSP will run the same search terms the parties agreed upon for Ms. Johnson and Ms. Leger. See July 3,

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2024 Email from A. Miner to J. Long; June 13, 2024 Email from J. Long to M. Nussbaum. Please further confirm that Mr. Bartz, Ms. Sommer, and Ms. Kramer will be added as “full” custodians—i.e., SaveOnSP will run all agreed upon search terms for the entire relevant period. *See* Dec. 22, 2023 Ltr. from J. Long to E. Snow at Appendix 3.

Please provide a response by July 26, 2024.

Very truly yours,

/s/ Saniya Suri

Saniya Suri